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and for Defendants AEROFLEX INCORPORATED,
AMI SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX INTERNATIONAL
CORP., MATROX TECH, INC., and
AEROFLEX COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICOH COMPANY, LTD..

Case No. C03-04669 MJJ (EMC)

Plaintiff,

Case No. C03-02289 MJJ (EMC)

VS.

AEROFLEX INCORPORATED, AMI SEMICONDUCTOR, INC., MATROX ELECTRONIC SYSTEMS LTD., MATROX GRAPHICS INC., MATROX INTERNATIONAL CORP., MATROX TECH, INC., AND AEROFLEX COLORADO SPRINGS, INC.

**DECLARATION OF DENISE M. DE MORY
IN SUPPORT OF ADMINISTRATIVE
MOTION FOR AN ORDER PLACING
DOCUMENTS UNDER SEAL
(Civil L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

Defendants.

SYNOPSYS, INC.,

Plaintiff,

VS.

RICOH COMPANY, LTD.,

Defendant.

1 I, Denise M. De Mory declare as follows:

2 1. I am an attorney at the law firm of Howrey LLP, counsel of record for Synopsys, Inc.
3 ("Synopsys") and Aeroflex Incorporated, Aeroflex Colorado Springs, AMI Semiconductor, Inc., Matrox
4 Electronic Systems, Ltd., Matrox Graphics Inc., Matrox International Corp., and Matrox Tech, Inc. ("the
5 Customer Defendants") in the above-captioned actions. I am a member in good standing of the State Bar of
6 California and have been admitted to practice before this Court. I have personal knowledge of the facts set
7 forth in this Declaration and, if called as a witness, could and would testify competently to such facts under
8 oath.

9 2. The Customer Defendants have lodged Exhibit Nos. 3; 9-14; 23; 37; 51-53; 55-57; 62-64;
10 67; 69-70; and 72 ("De Mory Exhibits") of the Declaration of Denise M. De Mory in Support Motions For
11 Summary Judgment with the clerk pursuant to Civil Local Rule 79-5. The lodged De Mory Exhibits were
12 generated by Synopsys, the Customer Defendants, or Ricoh, Ltd. and were designated confidential pursuant
13 to the protective order entered in this case.

14 3. The lodged De Mory Exhibits contain nonpublic Synopsys business information such as
15 sales information and license agreements. Additionally, the lodged documents discuss the internal
16 workings of Synopsys' Design Compiler product. This information is not publicly known and could cause
17 Synopsys competitive harm were it to become publicly known.

18 4. Further, the lodged De Mory Exhibits contain nonpublic Customer Defendant business
19 information such as product and sales information. Additionally, the lodged documents contain portions of
20 code used by the Customer Defendants to design their products. This information is not publicly known
21 and could cause the Customer Defendants competitive harm were it to become publicly known.

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5. Thus, Synopsys and the Customer Defendants believe that the lodged De Mory Exhibits are properly designated under the protective order entered in this case, and requests that the Court order the lodged De Mory Exhibits to be filed under seal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This declaration was executed at San Francisco, California on August 18, 2006

/s/Denise M. De Mory

Denise M. De Mory